

VIS), hydroxyl radicals might be created in the CS '995 environment following the **Fenton** and **photo-Fenton reactions**.

It is known in the art that the above-cited reactions work only with **transition metals** (M) (such as Fe, Cu, etc.) (see for example Lodha et al. Indian Journal of Chemistry, Vol. 47A, March 2008, pp. 397-400).

In view of the above, it should be pointed out that the present invention uses an **alkaline earth metal**, namely magnesium oxide.

In view of the teaching of CS 274995, and following the assumption of the Examiner that the generation of hydroxyl radicals in said publication is performed following the Fenton and photo-Fenton reactions, a person skilled in the art would never have the technical motivation to combine CS '995 with a catalyst such as MgO of Parrish et al., **which is not a transition metal**.

- Concerning Jen et al., the Applicant respectfully submits that methods for quantification of hydroxyl radicals in solution with salicylic acid are known in the art. However, this quantification can be performed only when **hydroxyl radicals are not immediately used in further chemical reactions**. In the present invention the radicals are produced and accumulated over time to reach a desired amount (see Fig. 1) and can be therefore quantified by the method of Jen et al.

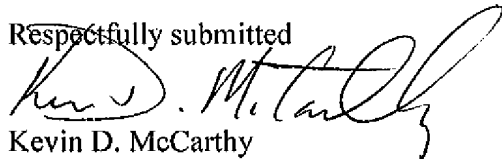
Conclusion

In view of the above, the Applicant respectfully submits that the present application is inventive over CS '995, Parrish et al., and Jen et al., either taken alone or in combination.

One skilled person in the art would never have taken CS '995 and combine it with the catalysts of Parrish et al since **only transition metals** should be used in Fenton and photo-Fenton reactions. Though Jen et al. relates to a method of quantification of hydroxyl radicals with salicylic acid, such quantification would hardly be used in CS '995 or Parrish et al., since hydroxyl radicals are only transient in these publications and **are not accumulated over time**, as disclosed in the present invention.

As it is believed that all of the rejections set forth in the Office Action have been fully addressed, favorable reconsideration and allowance are respectfully requested.

Respectfully submitted



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